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Attorneys for Defendant Acuity,

6 *A Mutual Insurance Company*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

8 LOUIS DeSALVIO, an individual,

9 Plaintiff,

10 v.

11 ACUITY, A MUTUAL INSURANCE
12 COMPANY; DOES 1 through 10 and ROE
13 Business Entities 1 through 10, inclusive,

14 Defendants.

Case No: 2:19-cv-02013-GMN-BNW

**STIPULATION AND ORDER TO
EXTEND THE DEADLINE FOR
DEFENDANT TO ITS FILE (1) REPLY IN
SUPPORT OF MOTION FOR PARTIAL
DISMISSAL OF PLAINTIFF'S
COMPLAINT AND (2) OPPOSITION TO
PLAINTIFF'S COUNTER-MOTION FOR
LEAVE TO FILE AN AMENDED
COMPLAINT**

(Third Request)

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17 Defendant, Acuity, and Plaintiff, Louis DeSalvio, by and through the parties' respective
18 counsel, stipulate and agree that the deadline for Acuity to file (1) its Reply in Support of Motion for
19 Partial Dismissal [ECF No. 5] and (2) file an Opposition to Plaintiff's Motion for Leave to File an
20 Amended Complaint [ECF No. 12], shall be extended from May 15, 2020, [ECF No. 14] to June 5,
21 2020.

22 This stipulation is submitted in compliance with LR IA 6-1. Good cause exists for the
23 requested extensions as the parties are currently discussing and negotiating the potential dismissal of
24 this action in favor of binding arbitration. The 702Firm Injury Attorneys ("The 702Firm") was
25 recently retained by Plaintiff. The 702Firm also seeks additional time to retain and review Plaintiff's
26 medical records. The 702Firm has experienced difficulty in contacting the medical providers in light
27 of the outbreak of a new coronavirus termed SARS-CoV-2 (Severe Acute Respiratory Syndrome
28 Coronavirus-2). The parties are unable to enter into a meaningful negotiation until The 702Firm has

1 an opportunity to review and assess medical records. The parties agree that the requested extension
2 is not being requested in bad faith or to delay these proceedings unnecessarily. This is the parties'
3 third request for an extension of the deadline.

4 Dated 14th day of May, 2020

5 **WILSON ELSEER MOSKOWITZ**
6 **EDELMAN & DICKER LLP**

7 /s/ Rachel L. Wise
8 Rachel L. Wise, Esq.
9 Nevada Bar No. 12303
10 *Attorneys for Defendant Acuity,*
11 *A Mutual Insurance Company*

Dated 14th day of May, 2020

THE 702FIRM INJURY ATTORNEYS

7 /s/ Richard A. Englemann
8 Michael C. Kane, Esq.
9 Nevada Bar No. 10096
10 Bradley J. Myers, Esq.
11 Nevada Bar No. 8857
12 Richard A. Englemann, Esq.
13 Nevada Bar No. 6965

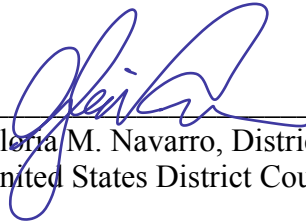
**MALCOLM P. LAVERGNE &
ASSOCIATES**

14 Malcolm P. LaVergne, Esq.
15 Nevada Bar No. 10121
16 *Attorneys for Plaintiff*

17 **ORDER**

18 **IT IS SO ORDERED.**

19 Dated this 14 day of May, 2020.

20 
21 Gloria M. Navarro, District Judge
22 United States District Court
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